

EXHIBIT 46

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RENALDO NAVARRO,

Plaintiff,

vs.

MENZIES AVIATION, INC., DOING
BUSINESS AS MENZIES; and DOES 1
through 10, inclusive,

Defendants.

Case No. 3:19-cv-08157-VC

**PLAINTIFF'S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 26(a)(1)**

State Court Action Filed: 10/23/19
Action Removed: 12/16/19

Judge: Hon. Vince Chhabria

Plaintiff Renaldo Navarro (hereinafter “Plaintiff”) makes the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

A. **Rule 26(a)(1)(A)(i) Individuals.** Plaintiff believes the following individuals are likely to have discoverable information that Plaintiff may use to support his claims:

1. Renaldo Navarro, may be contacted through counsel;
2. Jezen Canlas, 650-452-3810;
3. Rafael Vasquez, 510-715-0014;
4. Lorvino Samonte, 650-451-8701;
5. July Macapagal, phone number unknown;
6. Andrew Dodge, phone number unknown;
7. William Rodriguez, phone number unknown;

- 1 8. Anastacio Manuel, phone number unknown;
- 2 9. Ricardo Almelda, phone number unknown;
- 3 10. Patrick Moran, phone number unknown;
- 4 11. Rex Tosan, phone number unknown;
- 5 12. Wesley Faatalale, phone number unknown.

6 The individuals listed above, aside from Plaintiff, are Plaintiff's former co-workers,
7 managers, and/or supervisors. They are likely to have discoverable information concerning the
8 allegations made by Plaintiff in his complaint, including but not limited to matters related to:
9 Plaintiff's termination, Plaintiff's emotional distress due to his termination, and Plaintiff's
10 general day-to-day working conditions.

11 Without assuming any duty to supplement these disclosures beyond that imposed by Rule
12 26(e) of the Federal Rules of Civil Procedure, Plaintiff reserves the right to identify and/or call as
13 witnesses such other individuals with knowledge of relevant facts as may be discovered or
14 subsequently identified in the course of this litigation, including any individuals listed in
15 Defendant's initial disclosures or subsequent discovery responses.

16 **B. Rule 26(a)(1)(A)(ii) Documents.** The following categories of documents, data
17 compilations, and tangible things are in the possession, custody, or control of Plaintiff and may
18 be used to support their claims:

- 20 1. The records produced by Defendant as part of its response to Plaintiff's
21 records request per California Labor Code § 226;
- 22 2. The documents produced concurrently with these initial disclosures,
23 Bates stamped "RenaldoNavarro 000001-000014."

24 Without assuming any duty to supplement these disclosures beyond that imposed by Rule
25 26(e) of the Federal Rules of Civil Procedure, Plaintiff reserves the right to produce, disclose, or
26 introduce additional documents that may be discovered later during this litigation or that may be
27 otherwise subsequently identified.

C. Rule 26(a)(1)(A)(iii) Damages. Plaintiff's computation of damages will include: (1) wage loss damages due to his termination; (2) emotional distress damages due to his termination; (3) interest; (4) attorney's fees and costs; and (5) any other damages deemed appropriate by the Court or relevant law. An exact damage estimate or number is not known at this time. Plaintiff will supplement this answer at a later date.

D. Rule 26(a)(1)(A)(iv) Insurance. Plaintiff is not aware of any relevant insurance agreement.

DATED: March 17, 2020

LIBERATION LAW GROUP, P.C.

Arlo Garcia Uriarte
Attorney for PLAINTIFF